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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

JAN 24 1989

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Mancozeb - Unregistered Technical and Manufacturing

Use Products - E.I. DuPont de Nemours and Company, Inc. - Product Chemistry Data Dated December 2, 1988 - (No MRID Number Assigned) - DEB No. 4750

FROM:

Gobind P. Makhijani, Chemist

Residue Chemistry Branch

Hazard Evaluation Division (TS-769C)

TO:

Lois A. Rossi, PM 21

Fungicide-Herbicide Branch

Registration Division (TS-767C)

and

Reto Engler, Chief

Science Analysis and Coordination Branch

Health Effects Division (TS-769C)

THRU:

William J. Boodee, Section Head

Reregistration Section

Dietary Exposure Branch (TS-769C)

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-Gran May

In response to a Dietary Exposure Branch memorandum (H. Fonouni) dated August 15, 1988, E.I. DuPont de Nemours and Company, Inc. has submitted additional product chemistry data dated December 2, 1988 (no MRID Number assigned) for the unregistered Mancozeb and Manufacturing Use Products Nos. 352-341, 352-398, 352-449, and 352-343.

These data and our conclusions are described below.

62-1 - Preliminary Analysis of Product Samples

62-2 - Certification of Ingredient Limits

62-3 - Analytical Methods to Verify Certified Limits

The registrant estimates that the necessary data for the active ingredients as well as impurities can be generated by December, 1989.

Dietary Exposure Branch (DEB) has no objection to granting the required additional time. The Branch recognizes that granting of time extension is a Registration Division administrative decision.

A data gap still exists here.

Physical and Chemical Characteristics

63-8 - Solubility

63-11 - Octanol/Water Partiton Coefficient

The required data will be submitted by the registrant by January, 1989.

A data gap still exists here.

63-10 - Dissociation Constant

The registrant contends that Mancozeb does not dissociate in any measurable way. Since the product does not dissolve without decomposition, the registrant believes that the generation of erroneous dissociation constant would do more harm than good.

DEB concurs with the registrant on this topic.

cc: Mancozeb Registration Standard File, S.F., R.F., Reviewer, Circ., RBP, TOX (Coberly), PMSD/ISB (E. Eldredge), L. Rossi (PM 21).